

**ATTACHMENT B**ORDER NO. **90-1457**

Address Telephone Directories (ATD) and  
Business and Consumer List Products  
1988 Profit and Loss

	ATDs	B/C Lists	Total
Revenues	\$ 291,000	\$ 277,000	\$ 568,000
Expenses			
Direct	145,750	0	145,750
Allocated	69,451	243,779	313,230
Total	215,201	243,779	458,980
Rev-Exp	75,799	33,221	109,020
Overhead	48,635	55,094	103,729
Profit <Loss>	\$ 27,164	\$ <21,873>	\$ 5,291
Sources: PNB response to interrogatory PUC 2-001, PNB and staff stipulation, and Direct Testimony of Janet Watkins, Ex.B. <sup>1</sup>			

**Intracompany Relationships and Transactions**

On August 24, 1982, United States District Court Judge Harold Greene entered a decision in *United States v. American Telephone and Telegraph Company*, 552 F. Supp. 131 (D.D.C., 1982), *aff'd sub nom. Maryland v. United States*, 460 U.S. 1001, 103 S.Ct.1240, 75 L.Ed.2d 472 (1983), an anti-trust proceeding involving the Bell Telephone System. The decision in that case, commonly known as the Modified Final Judgment or MFJ, restructured the Bell System. Of particular importance, the MFJ regrouped the 22 Bell Operating Companies, which had been AT&T subsidiaries, into seven regional holding companies legally separate from AT&T. U S WEST, Inc. (U S WEST) is one of the holding companies. It encompasses 14 western states.

PNB is one of the three operating companies which are subsidiaries of U S WEST. MRG is also a subsidiary of U S WEST. MRC and U S WEST Direct Company (USWD) are subsidiaries of MRG.

<sup>1</sup>Official notice is taken of PNB's response to interrogatory PUC 2-001. Pursuant to OAR 860-14-050(2), a party may object to the fact noticed within 15 days of the notification and may explain or rebut the noticed fact.

ATTACHMENT B

ORDER NO. 90-1457

PNB is the only U S WEST company that is regulated by this Commission. Every service provided by PNB, except inside wire, is regulated. All revenues and all expenses incurred by PNB in the provision of every service except inside wire may be recognized "above the line" for rate-making purposes.

Prior to the breakup of the Bell System, PNB published the alphabetical and classified directories (white and yellow pages) and distributed the directories within its telephone service territory. Historically, profits from directory advertising have generated an important contribution to local telephone rates in Oregon and other states.<sup>2</sup>

USWD now publishes the white and yellow pages directories on behalf of PNB in Oregon. USWD sells the white and yellow page advertisements. U S WEST has attempted to transfer revenues away from PNB's regulated operations. The Commission has ordered that directory revenues shall remain with PNB or they will be imputed to PNB. *See Order Nos. 88-488 and 88-1041 (UI 54), 89-1044 (UI 54-Supp), and 89-1807 (UT 85).* These revenues, including advertising, are considered for ratemaking purposes and offset PNB's revenue needs.

In 1988 without Commission approval, PNB contracted with MRC to print PNB's Oregon ATD. MRC entered the market for ATDs in 1989.

In *Order No. 89-179*, (February 21, 1989), the Commission directed that:

Pacific Northwest Bell Telephone Company dba U S WEST Communications shall not abandon the provision of address telephone directories and business and consumer lists until specifically authorized by the Commission.

In March 1989, PNB sent a letter to its ATD customers advising them that it would not publish a 1989 book. The letter stated, "(A) similar type product is now offered by U S WEST Marketing Resources Group, a separate subsidiary of U S WEST, Inc." The notice directed them to a 1-800 number to contact an MRC representative. PNB sent a similar letter to its business and consumer list products customers.

In 1989, MRG and USWD purchased lists from PNB. MRG gave notice to PNB that USWD will not purchase any further lists, but MRG will continue to purchase the subscriber list update service. MRG plans to buy one list from PNB and provide the

---

<sup>2</sup>Order No. 89-1807 (December 29, 1989), at 3 et seq., contains an extensive discussion of the relationship between local telephone rates and revenues from directory advertising.

## ATTACHMENT B

ORDER NO. **90-1457**

list to both MRC and USWD. This action will further reduce the revenues to PNB from the sale of the lists.

PNB views itself as a resource for publishers to purchase the right to use non-confidential subscriber listings obtained in the process of providing exchange access line services. PNB owns and maintains the data base and the listings.

### OPINION

#### **Jurisdiction**

In *Order No. 89-1274*, the Commission determined that it has jurisdiction over the services at issue in this case. PNB reiterated the jurisdictional issue in its brief. PNB raised similar jurisdictional issues in *Pacific Northwest Bell Telephone Company, UT 85, Order 89-1807, at 9 et seq.* The Commission dealt with the jurisdictional issue at length in that order. The rationale stated there is adopted here. Suffice it to say that PNB is a "telecommunications utility," within the meaning of ORS 759.005(1), and is subject to the regulatory jurisdiction of the Commission. ORS 756.515 allows the Commission to investigate and enter orders with respect to "any matter relating to any . . . telecommunications utility". The Commission has jurisdiction over all services offered by a utility which are related to its activities as a regulated utility. *Northwest Climate Conditioning v. Lobdell, 79 Or App 560, 720 P2d 1281 (1986).*

#### **Improper Diversion of Revenues**

In this proceeding, PNB is seeking to divert revenues from regulated services to unregulated operations, while leaving substantial costs to be borne by basic service customers. The Commission has repeatedly stated its opposition to such actions. This order continues the Commission's policy of protecting ratepayers from improper diversion of revenues from regulated operations.

In spite of PNB's claims to the contrary, the effect on customers from the loss of revenues from ATD and business and consumer list products could be significant. PNB suggests that the only effect is loss of \$5,291 in profit from the services which it no longer intends to provide. This amount, it claims, is negligible and demonstrates that the services could be discontinued with little effect on the other ratepayers.

However, PNB ignores all the allocated expenses and overhead costs which it intends to leave with PNB's customers. The allocated expenses and overhead are costs which are incurred to provide both the ATD and business and consumer list products, as

ATTACHMENT B

ORDER NO. 90-1457

well as many other services provided to PNB's customers. For example, overhead includes costs for home office expenses and building rental. Allocated costs include costs for data processing, sales support and product management. These costs, totaling \$415,969 in 1988, will not disappear if PNB discontinues providing the services. PNB did not identify which expenses will continue if the Commission permits abandonment.

The Commission's efforts to evaluate the impact of the abandonment have been inhibited by PNB's failure to respond forthrightly to the staff's interrogatories. Without the information requested in the interrogatories, staff could not, and the Commission cannot, fully evaluate the profitability of the product.<sup>3</sup> Failure to answer the interrogatories interferes with the Commission's ability to more definitively evaluate the impact of U S WEST's strategy to transfer a money-making enterprise off the regulated books of PNB.

In this case, PNB's petition to abandon ATD and consumer and business list products is a sham. PNB is disposing of utility property without authority in violation of ORS 759.375. In the process of violating this statute, PNB is ignoring a Commission order that it not abandon the provision of ATD's and business and consumer list products. Finally, this "abandonment" procedure is inappropriate for the type of relief PNB is requesting. The statutes provide appropriate mechanisms for PNB to conduct certain operations on the unregulated side of its business. However, before it does so, it must meet the requirements set forth in the statutes.

The importance of retaining revenues to maintain low basic service rates in underscored in *United States v. Western Electric Co., Inc.*, February 6, 1989, 1989 WL 53809 (copy attached as Appendix B to Brief of Staff). There, Judge Greene considered a request of Ameritech, a regional holding company, for a waiver from the restriction on providing information services for Ameritech's "reverse directory" service known as CNA. The court granted the waiver on condition that the service supports local rates:

The Court previously ordered changes to be made in the decree, particularly with respect to the award of the Yellow Pages directories, bottomed in part upon its understanding that this would have the effect of protecting low telephone rates. Nevertheless, once that authority had been transferred

---

<sup>3</sup>PNB failed to respond adequately regarding PNB's percentage of the ATD market, the date when MRC entered the Oregon market, why U S WEST decided to have MRC enter the market in which PNB already had a presence, how many customers MRC has, MRC's revenues and expenses for the services at issue, and PNB's revenues for the services at issue for 1989. PNB could obtain all necessary information regarding MRC's operation through the aid of their parent holding company, U S WEST, if necessary.

## ATTACHMENT B

ORDER NO. 90-1457

to them from AT&T, a number of the Regional Companies set up their yellow Pages operations in such a way that the profits from those operations flowed not to the rate paying public but to the companies' other, more 'conglomerate' ventures. The Court will not permit a similar diversion in this instance.

For the reasons stated, the court will grant the waiver Ameritech is requesting to provide CNA service throughout its region but only upon the filing by the Regional Company of an affidavit from a responsible official having company authority to do so certifying that CNA-generated revenues will be used solely to support rates for basic telephone service, as that company has represented, and not diverted to support other business ventures.

While the revenues generated may not be as great, Judge Greene, as well as this Commission, understands that the ATDs and business and consumer list products contribute to maintaining reasonable and affordable basic service rates.

### **Petition Fails to Show Abandonment**

PNB's petition to abandon ATD and business and consumer list product services is denied. In its pleading initiating this proceeding, PNB gave "notice" to the Commission that it is abandoning these products. It filed notice under OAR 860-32-020 which provides:

(2) A public utility intending to discontinue a regulated service shall file a petition with the Commission. The petition shall be filed at least 60 days prior to the date the utility intends to abandon the service. At least 30 days prior to the date a public utility intends to abandon service, it shall notify affected customers of its intent. The public utility shall demonstrate that the abandonment will not deprive the public of necessary telecommunications services. The public utility shall agree to reinstate service at the request of the Commission to prevent the public from being deprived of necessary services.

Although PNB petitioned to "abandon" ATDs and business and consumer list products, this is not a true abandonment. Because another U S WEST subsidiary has taken over the products, this abandonment is little more than a manipulation of corporate entities for the purpose of diverting revenues to shareholders. U S WEST, as the

holding company directing PNB's activities, has little intention of abandoning this service. It intends only to shift the revenues to the shareholders, while leaving ratepayers with many of allocated and overhead expenses. Since there is no true abandonment, the petition must be denied.

#### **Disposition of Utility Property Without Authority**

ORS 759.375 provides, in pertinent part:

(1) No telecommunications utility doing business in Oregon shall without first obtaining the commission's approval of such transaction:

(a) Sell lease, assign or otherwise dispose of the whole of the property of such telecommunications utility necessary or useful in the performance of its duties to the public or any part thereof of a value in excess of \$10,000, or sell, lease, assign or otherwise dispose of any franchise, permit or right to maintain and operate such telecommunications utility or telecommunications utility property, or perform any service as a telecommunications utility: . . .

(2) Every such sale, lease, assignment, mortgage, disposition, encumbrance, merger or consolidation made other than in accordance with the order of the commission authorizing the same is void.

PNB is disposing of both a tangible and an intangible asset without Commission approval. The listings themselves are tangible assets. By selling the listings to MRG and abdicating the retail sales market, PNB is losing sales and profits. It is MRG which resells the listings to its customers and derives the benefits from the listings. The decision to stop pursuing retail customers for its listings is a disposition of utility property and is void without prior Commission approval.

Furthermore, the opportunity to publish ATDs and business and consumer list products is an intangible asset and is also subject to the provisions of ORS 759.375. In many respects these products are similar to yellow pages. These products are revenue generating activities of PNB which arise out of its status as the monopoly provider of basic telephone service. MRC and USWD have marketing advantages based on customer familiarity with the product promoted by the local exchange company. In addition, the customers of the product have faith in the quality of the ATD and list products. *See Order Nos. 88-488 and 88-1041 (UI 54) and 89-1044 (UI 54-Supp).* The petition to "abandon" the ATD and business and consumer list products is merely a guise

ORDER NO. 90-1457

by PNB to obtain Commission ratification of its disposition of the property without approval under ORS 759.375.

ORS 759.375 specifies that the statutory minimum value of property requiring Commission approval prior to its disposition is \$10,000. ATDs and business and consumer list products appear to be valuable products.<sup>4</sup> These products generated \$568,000 in revenues in 1988. The production of these directories translate into revenues for the company. Even though PNB was remiss in failing to provide clear financial data surrounding these services, the value is at least \$10,000.

However, much of the value of the assets to PNB's ratepayers has already been lost as a result of the transfer of activities to MRC. Rather than produce the directories itself and maintain the revenues on the regulated side of the business, PNB now views itself only as a resource for publishers to purchase the right to use non-confidential subscriber listings obtained in the process of providing exchange access line services. Under its current method of operation, PNB sells the lists to MRC or other publishers who, in turn, resell the lists to the customer. Once PNB sells the raw list, its only revenue source is the updates. The updates generate far less revenue than selling the entire list to a customer.

Furthermore, by causing PNB to discontinue active participation in the directory business, US WEST retained the value of the assets and diverted the revenues to its shareholders. In March 1989, PNB notified its customers that it would not produce a 1989 book and directed them to call MRC's 1-800 number to obtain a similar type product. (Exhibit I, p.8, and attachment Exhibit J and K.) While in theory PNB and MRC compete for the same customers, it is clear US WEST is intending that the shareholders reap the benefits of publisher sales.<sup>5</sup>

#### **Failure to Comply with the Intent of Commission Order**

PNB and US WEST embarked on this course of action in direct contravention of a Commission order. In *Order No. 89-179*, the Commission ordered PNB not to abandon providing address telephone directories and business and consumer lists until specifically authorized to do so by the Commission. The March letters to the customers

---

<sup>4</sup>Because of PNB's incomplete responses to the staff interrogatories, it is difficult to determine what the impact on the ratepayers will be from the transfer of services.

<sup>5</sup>After MRG entered the market, PNB did not sell any list products in 1989. PNB did not show what revenue it received as a result of selling its subscriber lists.

## ATTACHMENT B

ORDER NO. **90-1457**

show that PNB discontinued providing updated versions of these products and left the market contrary to *Order No. 89-179*.

### CONCLUSIONS

1. The Commission has jurisdiction over PNB's abandonment of ATD's and business and consumer list products.
2. PNB's petition to abandon ATD and business and consumer list product services is denied. The services provide revenues which are necessary to maintain basic telecommunications services.
3. In violation of ORS 759.375, PNB disposed of utility property with a value in excess of \$10,000 and a right to perform services as a public utility.
4. In violation of Order No. 89-179, PNB discontinued ATD and consumer and business list products prior to receiving Commission authorization to do so.

### ORDER

IT IS ORDERED that:

1. Pacific Northwest Bell Telephone Company, dba U S WEST Communications, shall not abandon Address Telephone Directories and business and consumer list products services.
2. Pacific Northwest Bell Telephone Company, dba U S WEST Communications, shall publish, and offer for sale to the public, up-to-date Address Telephone Directories and business and consumer list products.
3. Without prior approval of the Commission, Pacific Northwest Bell Telephone Company, dba U S WEST Communications, shall not sell, transfer or make available its lists of subscribers to any person including U S WEST, Inc., and any affiliated company for the purposes of resale or general publication. In determining whether to grant such approval, the Commission will consider whether:



ATTACHMENT B

ORDER NO. 90-1455

- a. The proposed action constitutes the sale or transfer of benefits which inure to Pacific Northwest Bell Telephone Company dba U S WEST Communications' operations as a local exchange carrier; and
- b. The proposed sale or transfer would dilute or dissipate the assets or revenue of Pacific Northwest Bell Telephone Company dba U S WEST Communications in its operations as a local exchange carrier.

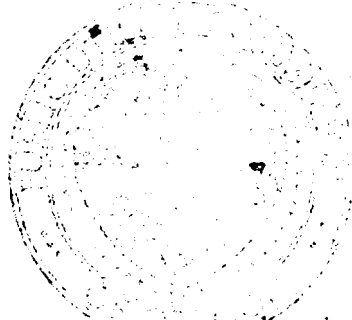
Made, entered, and effective SEP 27 1990



Myron B. Katz  
Chairman



Ron Eachus  
Commissioner



A party may request rehearing or reconsideration of this order pursuant to ORS 756.561.  
A party may appeal this order pursuant to ORS 756.580.

c:\workarea\UM228.ord

CERTIFICATE OF SERVICE

I certify that on the 29th day of May 1996, I served the foregoing REPLY COMMENTS OF THE OREGON PUBLIC UTILITY COMMISSION upon the party(ies), hereto by mailing, regular mail, postage prepaid, a true, exact and full copy thereof to:

Kevin C. Gallagher  
360 Communications Company  
8725 W. Higgins Road  
Chicago, IL 60631

Rodney L. Joyce  
Ginsburg, Feldman and Bress  
1250 Connecticut Avenue, NW  
Washington, DC 20036

Paul Schroeder  
AFB Midwest  
Suite 308  
401 N. Michigan Avenue  
Chicago, IL 60611

David A. Gross  
Kathleen Q. Abernathy  
AirTouch Communications, Inc.  
Suite 800  
1818 N Street, NW  
Washington, DC 20036

Mary Newmeyer  
John Garner  
Alabama Public Service Comm  
P.O. Box 991  
Montgomery, AL 36101

Don Schroer  
Alaska Public Utilities Comm  
Suite 400  
1016 Wet Sixth Avenue  
Anchorage, AK 99501

James Rowe  
Alaska Telephone Association  
Suite 304  
4341 B Street  
Anchorage, AD 99503

Dr. Barbara O'Conner  
Mary Gardiner Jones  
Henry Geller  
Alliance for Public Technology  
Suite 230  
901 15th Street  
Washington, DC 20005

Curtis T. White  
Allied Associated Partner, LP  
and GELD Information Systems  
4201 Connecticut Avenue, NW  
Washington, DC 20008-1158

Carolyn C. Hill  
ALLTEL Telephone Services Corp  
Suite 220  
655 15th Street, NW  
Washington, DC 20005

Riley M. Murphy  
Charles Kallenbach  
American Communications  
Services, Inc.  
Suite 100  
131 National Business Parkway  
Annapolis Junction, MD 20701

Brad E. Mutschelknaus  
Steve A. Augustino  
Marieann Zochowski  
Kelley Drye & Warren  
Suite 500  
1200 19th Street  
Washington, DC 20036

1 Alan Dinsmore  
American Foundation for Blind  
2 Suite 250  
1615 M Street, NW  
3 Washington, DC 20036

4 Alan R. Shark  
American Mobile  
5 Telecommunications  
Association, Inc.  
6 Suite 250  
1150 18th Street, NW  
7 Washington, DC 20036

8 Elizabeth R. Sachs  
Lukas McGowan Nace & Gutierrez  
9 12th Floor  
1111 Nineteen Street, NW  
10 Washington, DC 20036

11 Anne P. Schelle  
American Personal Comm  
12 One Democracy Center  
Suite 600  
13 6901 Rockledge Drive  
Bethesda, MD 20817

14 Wayne V. Black  
15 C. Douglas Jarrett  
Susan M. Hafeli  
16 Keller and Heckman  
Suite 500 West  
17 1001 G Street, NW  
Washington, DC 20001

18 Albert H. Kramer  
19 Robert F. Aldrich  
Dickstein Shapiro & Morin, LLP  
20 2101 L Street, NW  
Washington, DC 20037-1526

21 James Baller  
22 Lana Meller  
The Baller Law Group  
23 Suite 200  
1820 Jefferson Place  
24 Washington, DC 20036

25

26

Charles H. Helein  
Helein & Associates, PC  
Suite 700  
8180 Greensboro Drive  
McLean, VA 22102

Thomas P. Hester  
Kelly R. Welsh  
John T. Lenahan  
Mike Pabian  
Larry Peck  
Gary Phillips  
Ameritech  
30 S. Wacker Drive  
Chicago, IL 60606

Antoinette Cook Bush  
Linda G. Morrison  
Skladden, Arps, Slate Meagher  
& Flom  
1440 New York Avenue, NW  
Washington, DC 20005

Paul J. Berman  
Alane C. Weixel  
Covington & Burling  
1201 Pennsylvania Avenue, NW  
P.O. Box 7566  
Washington, DC 20044-7566

Carl W. Northrop  
Christine M. Crowe  
Paul, Hastings, Janofsky &  
Walker 1299  
Tenth Floor  
Pennsylvania Avenue, NW  
Washington, DC 20004

Mary Newmeyer  
John Garner  
Alabama Public Service Comm  
P.O. Box 991  
Montgomery, AL 36101

Don Schroer  
Alaska Public Utilities Comm  
Suite 400  
1016 West Sixth Avenue  
Anchorage, AK 99501

1 Bettye J. Gardner  
The Association for the Study  
2 of Afro-American Life and  
History, Inc.  
3 1407 Fourteenth Street, NW  
Washington, DC 20005-3704

4 Richard J. Metzger  
5 Emily M. Williams  
Association for Local  
6 Telecommunications Services  
Suite 560  
7 1200 19th Street, NW  
Washington, DC 20036

8 James U. Group  
9 L. Charles Keller  
Arter & Hadden  
10 Suite 400K  
1801 K Street, NW  
11 Washington, DC 20006

12 John T. Scott, III  
Crowell & Moring  
13 1001 Pennsylvania Avenue, NW  
Washington, DC 20004

14 Michael E. Glover  
15 Leslie A. Vial  
James G. Pachulski  
16 Lydia Pulley  
Edward D. Young, III  
17 Bell Atlantic  
Eighth Floor  
18 1320 N. Court House Road  
Arlington, VA 22201

19 M. Robert Sutherland  
20 Richard M. Sbaratta  
A. Kirven Gilbert III  
21 BellSouth Corporation  
Suite 1700  
22 1155 Peachtree Street, NE  
Atlanta, GA 30309-3610

23 Earl Pace  
24 Black Data Processors Assoc  
Suite 610  
25 1250 Connecticut Avenue  
Washington, DC 20036

26

Timothy E. Welch  
Hill and Welch  
1330 New Hampshire Avenue, NW,  
No. 113  
Washington, DC 20036

Rachel J. Rothstein  
Ann P. Morton  
Cable & Wireless, Inc.  
8219 Leesburg Pike  
Vienna, VA 22182

Danny E. Adams  
John J. Heitmann  
Kelley Drye & Warren LLP  
1200 19th Street NW  
Washington, DC 20036

Danny E. Adams  
John J. Heitmann  
Kelley Drye & Warren LLP  
1200 19th Street, NW  
Washington, DC 20036

Peter Arth, Jr.  
Edward W. O'Neill  
Mary Mack Adu  
505 Van Ness Avenue  
San Francisco, CA 94102

Richard Rubin  
Steven N. Teplitz  
Fleischman and Walsh, LLP  
Suite 600  
1400 16th Street, NW  
Washington, DC 20036

Robert M. Tettelbaum  
Citizens Utilities Company  
Suite 500  
1400 16th Street, NW  
Washington, DC 20036

Robert J. Hix  
Vincent Majkowski  
Colorado Public Utilities Comm  
1580 Logan Street  
Office Level Two  
Denver, CO 80203

1	Norman D. Rasmussen Colorado Independent Telephone Assoc. 3236 Hiwan Drive Evergreen, CO 80439	Debra Berlyn Competition Policy Institute Suite 310 1156 15th Street, NW Washington, DC 20005
4	Terrence P. McGarty COMAV Corp. 60 State Street 22nd Floor Boston, MA 02109	Reginald J. Smith Connecticut Department of Public Utility Control Ten Franklin Square New Britain, CT 06051
7	Joseph W. Waz, Jr. Beth O'Donnell Comcast Corporation 1500 Market Street Philadelphia, PA 19102	Bradley C. Stillman Dr. Mark N. Cooper Consumer Federation of America 1424 16th Street, NW Washington, DC 20036
10	Howard J. Symons Cherie R. Kiser Russell C. Merbeth Mintz, Levin, Cohn, Ferris Glovsky and Popeo, PC Suite 900 701 Pennsylvania Avenue Washington, DC 20004	Robert J. Sachs Howard B. Homonoff Continental Cablevision, Inc. Lewis Wharf, Pilot House Boston, MA 02110
14	Gerald M Zuckerman Edward B. Myers Communications/Energy Dispute Resolution Assoc. International Square Suite 400 1825 I Street, NW Washington, DC 20006	Brenda L. Fox Continental Cablevision, Inc. Suite 201 1320 19th Street Washington, DC 20036
19	Genevieve Morelli Competitive Telecomm. Assoc Suite 220 1140 Connecticut Avenue, NW Washington, DC 20036	Frank W. Lloyd Donna N. Lampert Mintz, Levin, Cohn, Ferris Glovsky & Popeo Suite 900 701 Pennsylvania Avenue Washington, DC 20004
22	Robert J. Aamoth Wendy I. Kirchick Reed Smith Shaw & McClay 1301 K Street, NW Suite 1100-East Tower Washington, DC 20005	Werner K. Iartenberger Leonard J. Kennedy Laura H. Phillips J.G. Harrington Dow, Lohnes & Albertson Suite 800 1200 New Hampshire Avenue Washington, DC 20036
25		
26		

PAGE 4 - CERTIFICATE OF SERVICE

1 Rebecca S. Weeks  
Carl Wayne Smith  
2 Defense Info Systems Agency  
701 S. Courthouse Road  
3 Arlington, VA 22204  
4 Andrew Joskow  
John Hayes  
5 John Henly  
Economic Regulatory Section  
6 Antitrust Division  
U.S. Department of Justice  
7 Room 8104  
55 Fourth Street, NW  
8 Washington, DC 20001  
9 Donald J. Russell  
Luin Fitch  
10 Telecommunications Task Force  
Antitrust Division  
11 U.S. Department of Justice  
Room 8104  
12 555 Fourth Street, NW  
Washington, DC 20001  
13  
Lawrence D. Crocker, III  
14 Public Service Commission of  
the District of Columbia  
15 450 Fifth Street, NW  
Washington, DC 20001  
16  
Thomas R. Gibbon  
17 Charles A. Zielinski  
Anthony M. Black  
18 Bell, Boyd & Lloyd  
Suite 1200  
19 1615 L Street, NW  
Washington, DC 20036  
20  
David C. Jatlow  
21 Young & Jatlow  
Suite 600  
22 2300 N Street, NW  
Washington, DC 20036  
23  
Economic Development Council  
24 DeSoto County  
DeSoto, MS  
25  
26

J. Christopher Dance  
Kerry Tassopoulos  
Excel Telecommunications Inc.  
Suite 1220  
9330 LBJ Freeway  
Dallas, TX 75243

Thomas K. Crowe  
Law Office of Thomas K. Crowe  
Suite 800  
2300 N Street, NW  
Washington, DC 20037

Cynthia Miller  
Florida Public Service Comm  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

B.B. Knowles  
Dave Baker  
Georgia Public Service Comm  
244 Washington Street, SW  
Atlanta, GA 30334-5701

Roy L. Morris  
Frontier Communications Svcs  
Suite 500  
1990 M Street, NW  
Washington, DC 20036

Michael J. Shortley, III  
Frontier Corporation  
180 South Clinton Avenue  
Rochester, NY 14646

Kathy L. Shobert  
General Communication, Inc.  
Suite 900  
901 15th Street, NW  
Washington, DC 20005

B.B. Knowles  
Dave Baker  
Georgia Public Service Comm  
244 Washington Street, SW  
Atlanta, GA 30334-5701

1 Robert N. Kittel  
Cecil O. Simpson, Jr.  
2 Office Judge Advocate General  
U.S. Army Litigation Center  
3 Suite 713  
901 N. Stuart Street  
4 Arlington, VA 22203-1837

5 Emily C. Hewitt  
Vincent L. Crivella  
6 Michael J. Ettner  
General Services Admin  
7 Room 4002  
18th & F Street, NW  
8 Washington, DC 20405

9 Dixie Horning  
Gray Panthers  
10 Suite 821  
2025 Pennsylvania Avenue, NW  
11 Washington, DC 20006

12 Maudine Cooper  
Greater Washington Urban  
13 League, Inc.  
3501 14th Street NW  
14 Washington, DC 20010

15 William P. Barr  
Ward W. Wueste  
16 Gail L. Policy  
GTE Service Corp  
17 Suite 1200  
1850 M Street, NW  
18 Washington, DC 20036

19 Richard E. Wiley  
R. Michael Senkowski  
20 Jeffrey S. Linder  
Wiley, Rein & Fielding  
21 1776 K Street, NW  
Washington, DC 20006

22 Robert C. Schoonmaker  
23 GVNW Inc./Management  
2270 LaMontana Way  
24 Colorado Springs, 80918

25

26

Robert A. Hart IV  
Hart Engineers  
P.O. Box 66436  
Baton Rouge, LA 70896

H. Keith Oliver  
Home Telephone Co., Inc.  
200 Tram Street  
Moncks Corner, SC 29461

Dana Frix  
Douglas G. Bonner  
Swidler & Berlin, Chtd.  
Suite 300  
3000 K Street, NW  
Washington, DC 20007

Weldon B. Stutzman  
Idaho Public Utilities Comm  
472 West Washington Street  
Boise, ID 83702

Myra L. Karegianes  
Illinois Commerce Commission  
Suite C-800  
160 N. LaSalle Street  
Chicago, IL 60601

Dwight E. Zimmerman  
Illinois Indep Telephone Assn.  
RR 13, 24B Oakmont Road  
Bloomington, IL 61704

Robert C. Glazier  
Indiana Utility Reg Comm  
Indiana Gov Center South  
Suite E306  
302 West Washington  
Indianapolis, IN 46204

Fiona Branton  
Information Technology  
Industry Council  
1250 Eye Street, NW  
Washington, DC 20005

Cindy Schonhaut  
IntelCom Group (U.S.A.) Inc.  
9605 East Maroon Circle  
Englewood, CO 80112

1 Albert H. Kramer  
Robert F. Aldrich  
2 Dickstein, Shapiro & Morin LLP  
2101 L Street, NW  
3 Washington, DC 20037-15267

4 Jonathan E. Canis  
Reed Smith Shaw & McClay  
5 Suite 1100 East Tower  
1301 K Street, NW  
6 Washington, DC 20005

7 William H. Smith, Jr.  
Allan Kniep  
8 Mary Jo Street  
Iowa Utilities Board  
9 Lucas State Office Building  
Des Moines, IA 50319

10 Christopher W. Savage  
11 Navid C. Haghighi  
Cole, Raywid & Braverman, LLP  
12 Suite 200  
1919 Pennsylvania Avenue, NW  
13 Washington, DC 20006

14 David Heinemann  
Julie Thomas Bowles  
15 Kansas Corporation Commission  
1500 S.W. Arrowhead Road  
16 Topeka, KS 66604

17 Amy E. Dougherty  
Public Service Comm Kentucky  
18 730 Schenkel Lane  
P.O. Box 615  
19 Frankfort, KY 40602

20 Richard N. Koch  
10 Lilac Street  
21 Sharon, MA 02067

22 Lee M. Weiner  
Douglas W. Kinkoph  
23 LCI International Telecom Corp  
Suite 800  
24 8180 Greensboro Drive  
McLean, VA 22102

25

26

Robert J. Aamoth  
Jonathan E. Canis  
Reed Smith Shaw & McClay  
Suite 100 Est Tower  
1301 K Street, NW  
Washington, DC 20005

Peter A. Rohrback  
Linda L. Oliver  
Kyle D. Dixon  
Hogan & Hartson LLP  
555 Thirteenth Street, NW  
Washington, DC 20004

Robert A. Mazer  
Albert Shuldiner  
Mary Pape/Vinson & Elkins  
1455 Pennsylvania Avenue, NW  
Washington, DC 20004-1008

Lawrence St. Blanc  
Gayle T. Kellner  
Louisiana Public Service Comm  
P.O. Box 91154  
Baton Rouge, LA 70821-9154

Stephen R. Rosen  
Theodore M. Weitz  
Lucent Technologies Inc.  
475 South Street  
Morristown, NJ 07962-1976

Joel B. Shifman  
Maine Public Utilities Comm  
242 State Street  
State House Station No. 18  
Augusta, ME 04333-0018

Bryan G. Moorhouse  
Susan Stevens Miller  
Maryland Public Service Comm  
Six St. Paul Street  
Baltimore, MD 21202



1 Scott Harshbarger  
Daniel Mitchell  
2 The Commonwealth of  
Massachusetts,  
3 Public Protection Bureau  
Fourth Floor  
4 200 Portland Street  
Boston, MA 02114  
5  
6 John B. Howe  
Mary Clark Webster  
janet Gail Besser  
7 The Commonwealth of  
Massachusetts  
8 Department of Public Utilities  
Twelfth Floor  
9 100 Cambridge  
Boston, MA 02202  
10  
11 Greg Berberich  
Matanuska Telephone Assn, Inc.  
1740 S. Chugach Street  
12 Palmer, AK 99645  
13 Don Sussman  
Larry Fenster  
14 Charles Goldfarb  
Mark Bryant  
15 Mary L. Brown  
MCI Telecommunications Corp.  
16 1801 Pennsylvania Avenue, NW  
Washington, DC 20006  
17  
18 Anthony C. Epstein  
Donald Verrilli  
Maureen F. DelDuca  
19 Jenner and Block  
601 13th Street, NW  
20 Washington, DC 20005  
21 Henry M. Rivera  
Larry S. Solomon  
22 J. Thomas Nolan  
Ginsburg, Feldman & Bress  
23 1250 Connecticut Avenue, NW  
Washington, DC 20036  
24  
25  
26

David N. Porter  
MFS Communications Co., Inc.  
Suite 300  
3000 K Street, NW  
Washington, DC 20007

Andrew D. Lipman  
Russell M. Blau  
Swidler & Berlin, Chtd  
Suite 300  
3000 K Street, NW  
Washington, DC 20007

Agris Pavlovskis  
Michigan Exchange Carriers  
Assn., Inc.  
1400 Michigan National Tower  
Lansing, MI

Glen A. Schmiede  
Mark J. Burzych  
Foster, Swift, Collins &  
Smith, PC  
313 S. Washington Square  
Lansing, MI 48933

John G. Strand  
John L. O'Donnell  
John C. Shea  
Michigan Public Service Comm  
6545 Mercantile Way  
Lansing, MI 48911

Richard J. Johnson  
Michael J. Bradley  
Moss & Barnett  
4800 Norwest Center  
90 S. Seventh Street  
Minneapolis, MN 55402-4129

Harold Crumpton  
Eric Witte  
Missouri Public Service Comm  
P.O. Box 360  
Jefferson City, MO 65402

1 Gene P. Belardi  
MobileMedia Communications  
2 Suite 935  
2101 Wilson Boulevard  
3 Arlington, VA 22201

4 Karen Finstad Hammel  
Montana Public Service Comm  
5 1702 Prospect Avenue  
P.O. Box 202601  
6 Helena, MT 59620-2601

7 James N. Horwood  
Scott H. Strauss  
8 Wendy S. Lader  
Spiegel & McDirmid  
9 Suite 1100  
1350 New York Avenue, NW  
10 Washington, DC 20005-4798

11 Camille Failla-Murphy  
National Association of  
12 Commissions for Women  
1828 L Street, NW  
13 Washington, DC 20036

14 Aliceann Wohlbruck  
national Association of  
15 Development Organizations  
Suite 630  
16 444 N. Capitol Street, NW  
Washington, DC 20001

17 Paul Rodgers  
18 Charles D. Gray  
James Bradford Ramsay  
19 NARUC  
1102 ICC Building  
20 P.O. Box 684  
Washington, DC 20044

21 Martha S. Hogerty  
22 NASUCA  
Suite 550  
23 1133 15th Street, NW  
Washington, DC 20005

24 John Crump  
25 National Bar Assn.  
1225 11th Street, NW  
26 Washington, DC 20001-4217

Daniel L. Brenner  
Neal M. Goldberg  
David L. Nicoll  
National Cable Television  
Assn., Inc.  
1724 Massachusetts Avenue, NW  
Washington, DC 20036

Howear J. Symons  
Cherie R. Kiser  
Christopher J. Harvie  
Charon R. Harris  
Jennifer A. Purvis  
Mintz Levin Cohen Ferris  
Suite 900  
701 Pennsylvania Avenue, NW  
Washington, DC 20004

Stephen Protulis  
National Coun Senior Citizens  
1331 F. Street, NW  
Washington, DC 20004

Joanne Salvador Bochis  
National Exchange Carrier  
Assn., Inc.  
100 South Jefferson Road  
Whippany, NJ 07981

Dr. Marta Soptomayer  
National Hispanic Coun Aging  
2713 Ontario Road  
Washington, DC 20009

Margot Smiley Humphrey  
Koteen & Naftalin  
Suite 1000  
1150 Connecticut Avenue, NW  
Washington, DC 20036

David Cosson  
L. Marie Guillory  
Steven E. Watkins  
National Telephone Coop Assn.  
2626 Pennsylvania Avenue, NW  
Washington, DC 20037

Dr. Garry A. Mendez  
The National Trust/TrustNet  
7411 Riggs Road  
Adelphia, MD 20783

1 Douglas L. Povich  
Kelly & Povich, PC  
2 Suite 300  
1101 30th Street, NW  
3 Washington, DC 20007

4 Commissioner Lowell C. Johnson  
Nebraska Public Service Comm  
5 300 The Atrium  
1200 N Street  
6 P.O. Box 94927  
Lincoln, NE 68509-4927  
7

8 James A. Eibel  
Network Reliability Council II  
Secretariat  
9 7613 William Penn Place  
Indianapolis, IN 46256  
10

11 E. Barclay Jackson  
New Hampshire Public Utilities  
Comm  
12 Eight Old Suncook Road  
Concord, NH 03301-7319  
13

14 David Kaufman  
New Mexico State Corporation  
Commission  
15 P.O. Box 1269  
Santa Fe, NM 87504-1269  
16

17 Maureen O. Helmer  
Public Service Commission of  
the State of New York  
18 Three Empire State Plaza  
Albany, NY 12223  
19

20 Ann Kutter  
Douglas Elfner  
New York State Consumer  
21 Protection Board\*

22 J. Scott Bonney  
NEXTLINK Communications, LLC  
23 155 108th Avenue, NE  
Bellevue, WA 98004  
24

25

26

Daniel M. Waggoner  
Davis Wright Tremaine  
2600 Century Square  
1501 Fourth Avenue  
Seattle, WA 98101-1688

Robert S. Foosaner  
Lawrence R. Krevor  
Laura L. Holloway  
Nextel Communications, Inc.  
Suite 1001  
800 Connecticut Avenue, NW  
Washington, DC 20006

Robert P. Gruber  
Antoinette R. Wike  
North Carolina Utilities Comm  
430 North Salisbury Street  
P.O. Box 29520  
Raleigh, NC 27626-0520

Bruce Hagen  
Susan E. Wefald  
Leo M. Reinbold  
North Dakota Public Service  
Commission\*

John G. Lamb, Jr.  
Northern Telecom Inc.  
2100 Lakeside Boulevard  
Richardson, TX 75081-1599

Stephen L. Goodman  
Halprin Temple Goodman Sugrue  
Suite 650, East Tower  
1100 New York Avenue, NW  
Washington, DC 20005

Saul Fisher  
William J. Balcerski  
NYNEX  
1111 Westchester Avenue  
White Plains, NY 10604

1 Robert S. Tongren  
David C. Bergmann  
2 Thomas J. O'Brien  
Karen J. Hardie  
3 Office Ohio Consumers' Counsel  
15th Floor  
4 77 South High Street  
Columbus, OH 43266-0550  
5  
6 Betty D. Montgomery  
Duane W. Luckey  
Steven T. Nourse  
7 Jodi Jenkins Bair  
Public Utilities Comm of Ohio  
8 180 East Broad Street  
Columbus, OH 43215-3793  
9  
10 Ernest G. Johnson  
John Gray  
Maribeth D. Snapp  
11 Oklahoma Corporation Comm  
P.O. Box 25000-2000  
12 Oklahoma City, OK 73152-2000  
13 Mark J. Tauber  
Mark J. O'Connor  
14 Piper & Marbury, LLP  
Seventh Floor  
15 1200 19th Street, NW  
Washington, DC 20036  
16  
17 Roger Hamilton  
Ron Eachus  
Joan Smith  
18 Oregon Public Utility Comm  
550 Capitol Street, N.E.  
19 Salem, OR 97310  
20 Lisa M. Zaina  
Ken Johnson  
21 OPASTCO  
Suite 700  
22 21 Dupont Circle, NW  
Washington, DC 20036  
23  
24  
25  
26

Martin D. Ard  
Randall E. Cape  
John W. Bogy  
Pacific Telesis Group  
Room 1530A  
140 New Montgomery Street  
San Francisco, CA 94105

Margaret E. Garber  
Pacific Telesis Group  
1275 Pennsylvania Avenue, NW  
Washington, DC 20004

Judith St. Ledger-Roty  
Paul G. Madison  
Reed Smith Shaw & McClay  
Suite 1100 - East Tower  
1301 K Street, NW  
Washington, DC 20005-3317

Maureen A. Scott  
Veronica A. Smith  
John F. Povilaitis  
Pennsylvania Public Util Comm  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Mark J. Golden  
Robert R. Cohen  
Personal Communications  
Industry Assn.  
Suite 700  
500 Montgomery Street  
Alexandria, VA 22314-1561

Jerome K. Blask  
Daniel E. Smith  
Gurman, Blask & Freedman  
Suite 500  
1400 Sixteenth Street, NW  
Washington, DC 20036

Joe D. Edge  
Richard J. Arsenault  
Tina M. Pidgeon  
Drinker, Biddle & Reath  
901 Fifteenth Street, NW  
Washington, DC 20005

1 George Petrutsas  
Paul J. Feldman  
2 Fletcher, Heald & Hildreth  
Eleventh Floor  
3 1300 North 17th Street  
Rosslyn, VA 22209  
4  
5 James D. Ellis  
Robert M. Lynch  
David F. Brown  
6 SBC Communications Group, Inc.  
575 Scherers Court  
7 Worthington, OH 43085  
8 Reginald R. Bernnard  
SDN Users Association, Inc.  
9 P.O. Box 4014  
Bridgewater, NJ 08807  
10  
11 Eric E. Breisach  
Christopher C. Cinnamon  
Howard & Howard  
12 107 W. Michigan Avenue  
Suite 400  
13 Kalamazoo, MI 49007  
14 R. Glenn Rhyne  
South Carolina Public Service  
15 Commission  
P.O. Box 11649  
16 Columbia, SC 29211  
17 Rolayne Ailts  
South Dakota Public Utilities  
18 Commission  
500 E. Capital  
19 Pierre, SD 57501  
20 Madelyn M. DeMatteo  
Alfred J. Brunetti  
21 Maura C. Bollinger  
Southern New England Telephone  
22 227 Church Street  
New Haven, CT 06506  
23  
24 Rodney L. Joyce  
J. Thomas Nolan  
Ginsburg, Feldman and Bress  
25 1250 Connecticut Avenue, NW  
Washington, DC 20036  
26

Leon M. Kestenbaum  
Jay C. Keithley  
H. Richard Juhnke  
Sprint Corporation  
Eleventh Floor  
1850 M Street, NW  
Washington, DC 20036

Jonathan M. Chambers  
Sprint Spectrum, LP  
Suite M-112  
1801 K Street, NW  
Washington, DC 20036

Jonathan D. Blake  
Kurt A. Wimmer  
Gerald J. Waldron  
Donna M. Epps  
Covington & Burling  
1201 Pennsylvania Avenue, NW  
PO Box 7566  
Washington, DC 20044-7566

Michael S. Fox  
John Staurulakis, Inc.  
6315 Seabrook Road  
Seabrook, MD 20706

Professor Nicholas Economides  
Stern School of Business  
New York University  
New York, NY 10012

Chris Barron  
TCA, Inc.  
Suite 1  
3617 Betty Drive  
Colorado Springs, CO 80917

Margot Smiley Humphrey  
Koteen & Naftalin, LLP  
Suite 1000  
1150 Connecticut Avenue, NW  
Washington, DC 20036

Howard J. Symons  
Sara S. Seidman  
Mintz, Levin, Cohn, Ferris  
Suite 900  
701 Pennsylvania Avenue, NW  
Washington, DC 20004

1 Linda L. Oliver  
Kyle D. Dixon  
2 Hogan & Hartson LLP  
555 Thirteenth Street, NW  
3 Washington, DC 20004  
  
4 Philip L. Verveer  
Sue D. Blumenfeld  
5 Thomas Jones  
Willkie Farr & Gallagher  
6 Thre Lafayette Centre  
11552 21st Street, NW  
7 Washington, DC 20036  
  
8 Bridger Mitchell  
Charles River Associates, Inc.  
9 Suite 370  
285 Hamilton Avenue  
10 Palo Alto, CA 94301  
  
11 Jot D. Carpenter, Jr.  
Telecommunications Industry  
12 Association  
Suite 315  
13 1201 Pennsylvania Avenue, NW  
Washington, DC 20004  
  
14 Charles C. Hunter  
15 hunter & Mow, PC  
Suite 701  
16 1620 I Street, NW  
Washington, DC 20006  
  
17 Encarnita Catalan-Marchan  
18 Maria Pizarro-Figueroa  
Telefonica Larga Distancia  
19 de Puerto Rico, Inc.  
Metro Office Park  
20 Building No. 8, Street No. 1  
Guaynabo, PR 00922  
  
21 Alfred M. Mamlet  
22 Philip L. Malet  
Colleen A. Sechrest  
23 Steptoe & Johnson LLP  
1330 Connecticut Avenue, NW  
24 Washington, DC 20036

Pat Wood III  
Robert W. Gee  
Judy Walsh  
Public Utility Comm Texas  
7800 Shoal Creek Boulevard  
Austin, TX 78757

Suzi Ray McClellan  
Laurie Pappas  
Texas Office Public Utility  
Counsel  
Suite 290-E  
7800 Shoal Creek Boulevard  
Austin, TX 78757

Tim Raven  
Texas Telephone Association  
Suite 1005  
400 West 15th Street  
Austin, TX 78701-1647

Paul B. Jones  
Janis A. Stahlhut  
Donald F. Shephard  
Time Warner Communications  
Holdings, Inc.  
300 Stamford Place  
Stamford, CT 06902

Aaron I. Fleischman  
Richard Rubin  
Mitchell F. Brecher  
Steven N. Teplitz  
Fleischman and Walsh  
1400 Sixteenth Street, NW  
Washington, DC 20036

Jim Whitefield  
Gary L. Mann  
TSTCI  
Suite 200  
3721 Executive Center Drive  
Austin, TX 78731-1639

1 Robert B. McKenna  
Kathryn Marie Krause  
2 James T. Hannon  
Dan L. Poole  
3 US WEST, Inc.  
Suite 700  
4 1020 19th Street, NW  
Washington, DC 20036  
5  
6 Steve Hamlen  
Unicom, Inc.  
5450 A Street  
7 Anchorage, AK 99518-1291  
8 Perry W. Woofter  
United Calling Network, Inc.  
9 Suite 200  
1200 29th Street, NW  
10 Washington, DC 20007  
11 Jennifer Simpson  
United Cerebral Palsy Assoc  
12 Suite 700  
1660 L Street, NW  
13 Washington, DC 20036  
14 Jordan Clark  
United Homeowners Assn.  
15 1511 K Street, NW  
Washington, DC 20005  
16  
17 Mary McDermott  
Linda Kent  
Charles D. Cosson  
18 Jere W. Glover  
David W. Zesiger  
19 United States Small Business  
Administration  
20 Suite 7800  
409 Third Street, SW  
21 Washington, DC 20416  
22 Keith Townsend  
United States Telephone  
23 Association  
Suite 6700  
24 1401 H Street, NW  
Washington, DC 20005  
25  
26

Stephen F. Mecham  
Utah Public Service Commission  
160 East 300 South  
P.O. Box 45585  
Salt Lake City, UT 84145

Jeffrey L. Sheldon  
Sean A. Stokes  
UTC  
Suite 1140  
1140 Connecticut Avenue, NW  
Washington, DC 20036

C.J. Cain  
Utilex, Inc.  
P.O. Box 991  
Greenville, NC 27834

Raymond G. Bender, Jr.  
J. G. Harrington  
Peter A. Batacan  
Dow, Lohnes & Albertson  
Suite 800  
1200 New Hampshire Avenue, NW  
Washington, DC 20036

James U. Troup  
L. Charles Keller  
Arter & Hadden  
Suite 400K  
1801 K Street, NW  
Washington, DC 20006

Sheldon M. Katz  
George E. Young  
Vermont Depart Public Service  
Drawer 20  
Montpelier, VT 056520-2601

Edward C. Addision  
Virginia St Corporation Comm  
Division of Communications  
P.O. Box 1197  
Richmond, VA 23218

1 Terry A. Vann  
Richard A. Finnigan  
2 Washington Independent  
Telephone Association  
3 Suite B-1  
2405 Evergreen Park Drive SW  
4 Olympia, WA 98502  
  
5 Carol Weinhaus  
University of Florida College  
6 of Business Administration  
121 Mt. Vernon Street  
7 Boston, MA 02108  
  
8 Charles H. Kennedy  
James A. Casey  
9 Morrison & Foerster, LLP  
Suite 5500  
10 2000 Pennsylvania Avenue, NW  
Washington, DC 20006  
11  
12 Marc A. Stone  
Fred Williamson & Associates  
Suite 200  
13 2921 East 91st Street  
Tulsa, OK 74137-3300  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

26 tjh/WBW0542.PLE

Timothy R. Graham  
Robert M. Berger  
Joseph M. Sandri, Jr.  
WinStar Communications, Inc.  
1146 19th Street, NW  
Washington, DC 200036

Dana Frix  
Mary C. Albert  
Antony R. Petrilla  
Swidler & Berlin, Chtd.  
Suite 300  
3000 K Street  
Washington, DC 20007

Suzi Ray McClellan  
Laurie Pappas  
Texas Office of Public Utility  
Counsel  
Suite 290-E  
7800 Shoal Creek Boulevard  
Austin, TX 78757



---

W. Benny Won #76385  
Assistant Attorney General  
Of Attorneys for Oregon  
Public Utility Commission